

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA AND STATES
OF THE UNITED STATES, ex rel. PATRICK
DONOHUE,

Plaintiff,

-against-

RICHARD CARRANZA, et al.,

Defendants.

Case No. 20-cv-05396-GHW-SDA

NOTICE OF MOTION

PLEASE TAKE NOTICE, that defendants Niagara Falls City School District s/h/a Niagara Falls Public School District and Mark Laurrie, in his official capacity as Superintendent (“Niagara”), by their attorneys, Shaub, Ahmety, Citrin & Spratt, LLP, will move this Court at the United States Courthouse for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007-1312, at a time and place to be scheduled by this Court, for an Order pursuant to Rules 12(b)(6), 9(b), and 12(b)(3) of the Federal Rules of Civil Procedure dismissing the Second Amended Complaint (“SAC”) as against Niagara, and for such other and further relief as this Court deems just and proper.

Dated: Lake Success, New York
December 23, 2022

Shaub, Ahmety, Citrin & Spratt, LLP

By: 
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in his official capacity as Superintendent
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To: All Counsel of Record via ECF